

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE**

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| In re: | Chapter 7 |
| BAYOU STEEL BD HOLDINGS, LLC, <i>et al.</i> , ¹ | Case No. 19-12153 (KBO) |
| Debtors. | (Jointly Administered) |
| GEORGE L. MILLER, in his capacity as Chapter 7 Trustee of BAYOU STEEL BD HOLDINGS, L.L.C., <i>et al.</i> , | Adv. Proc. No. 21-50233 (KBO) |
| Plaintiff, | |
| vs. | |
| TMS INTERNATIONAL, LLC, | |
| Defendant. | |

**STIPULATION FOR EXTENSION OF TIME FOR DEFENDANT TO
ANSWER, MOVE OR OTHERWISE RESPOND TO THE COMPLAINT**

Plaintiff, George L. Miller in his capacity as chapter 7 trustee of Bayou Steel BD Holdings, L.L.C., *et al.*, (the “Plaintiff”), for the estates of the above-captioned debtors (the “Debtors”) in the above-captioned cases pending under chapter 7 of title 11 of the United States Code (the “Bankruptcy Code”), by and through his undersigned counsel and defendant TMS International, LLC (the “Defendant,” and together with Plaintiff, the “Parties”), enter into this *Stipulation for Extension of Time for the Defendant to Answer, Move or Otherwise Respond to the Complaint* (the “Stipulation”) and hereby stipulate and agree as follows:

1. The Parties agree and stipulate that the time within which the Defendant may answer, move, or otherwise plead in response to the *Complaint* [D.I. 1] in the above-captioned adversary proceeding is hereby extended to and including May 2, 2021.

¹ The Debtors in these chapter 11 cases, along with the last four digits of each Debtor’s federal tax identification number, are Bayou Steel BD Holdings, L.L.C., a Delaware limited liability company (1984), BD Bayou Steel Investment, LLC, a Delaware limited liability company (1222), and BD LaPlace, LLC, a Delaware limited liability company (5783).

2. Except as specifically set forth herein, all rights, claims and defenses of the Parties are fully preserved.

Dated: March 25, 2021

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Peter J. Keane

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